

HARRY A. HAYCOCK
Senior Vice President
Chief Engineer

2300 One Utah Center
Salt Lake City, Utah 84140
(801) 220-4603
FAX (801) 220-4615

RECEIVED

JUN - 5 1992

Federal Communications Commission
Office of the Secretary



June 4, 1992

Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

RECEIVED

JUN 5 1992

FCC MAIL BRANCH

In the matter of)
Redevelopment of Spectrum to) ET Docket No. 92-9
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

Dear Ms. Searcy:

COMMENTS OF PACIFICORP

Pursuant to Section 1.415 of the Commission's Rules, PacifiCorp hereby respectfully submits its comments on the Notice of Proposed Rulemaking (NPRM), FCC 92-20, released February 7, 1992, in the above captioned matter.

I. Introduction

PacifiCorp is a public utility engaged in the generation, transmission, and distribution of electrical energy for use by the general public in the states of Washington, Oregon, California, Idaho, Montana, Wyoming and Utah.

PacifiCorp has in operation an extensive microwave system which is essential to the reliable and safe operation of the electrical system. About 130 transmitters (65 Paths) of the company's microwave system operates in the 2 GHz band. The 2 GHz equipment is approximately 30% of the total microwave equipment within the company.

No. of Copies rec'd 0 + 4
List A B C D E

RECEIVED

JUN 5 1992

Donna R. Searcy, Secretary
June 4, 1992
Page 2

FCC MAIL BRANCH

II. The 1850-2200 MHz Band Should Not Be Reallocated For The Creation Of A Spectrum Reserve

PacifiCorp opposes a reallocation of spectrum in the 1850-2200 MHz band for the creation of a spectrum reserve for development of emerging technologies. In addition to the financial impact of over \$40 million to provide alternative communications services, we would also lose some of the technical advantages afforded to us by use of the 2 GHz band. Our present available frequency spectrum is congested, and removing the 2 GHz band as an option will further aggravate this congestion for Part 94 users. In several areas, the only available remaining frequency band for our use is 2 GHz band. The rural nature of much of our service area makes it unlikely that emerging technologies will be deployed there for many years.

PacifiCorp urges the Commission to consider alternate bands, such as the 2500-2690 MHz "wireless cable" band as a possible "home" for the spectrum reserve.

III. Actions To Be Taken If 2 GHz Band Is Reallocated

PacifiCorp urges that if the 2 GHz band is reallocated for emerging technologies, the Commission should grant indefinite co-primary status for all existing 2 GHz microwave systems and should permit reasonable system modifications and expansions.

If present users must relocate to a different band, we urge the Commission to allow for voluntary negotiations between new service providers and existing users. These negotiations should include new service providers paying for the relocation of existing users.

In no case should anyone be allowed to occupy the band without formal rules and remedies.

IV. The 1710-1850 MHz Band Should Be Made Available For Displaced 2 GHz Users

PacifiCorp urges the FCC and the National Telecommunications and Information Administration (NTIA) to commence discussions to open the 1710-1850 MHz Federal Government spectrum for use by displaced 2 GHz users on a co-primary, non-interference basis.

V. The FCC Should Open The 4, 6, and 11 GHz Bands For Private Microwave Use

PacifiCorp supports the Utilities Telecommunications Council "Petition for Rulemaking," filed March 31, 1992, to make the 4 GHz, 6 GHz, and 11 GHz common

Donna R. Searcy, Secretary
June 4, 1992
Page 3

carrier bands available for routine licensing in the Private Operational Microwave Service under Part 94, and to adopt appropriate channeling plans and technical standards to ensure that these bands are adequate to meet the needs of existing and future private microwave systems.

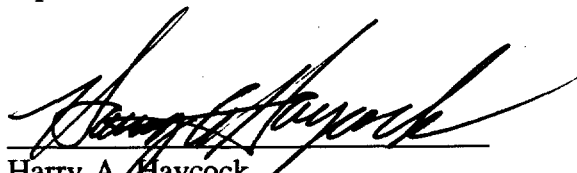
VI. Conclusion

PacifiCorp urges the Commission to avoid use of the 1850-2200 MHz band for a spectrum reserve. PacifiCorp feels strongly that in the event existing users must be relocated, replacement spectrum with similar technical advantages should be provided, present users should not be forced to relocate until a proven technology exists that requires the spectrum, and that new service providers be required to pay for relocation of our essential services.

Wherefore, PacifiCorp respectfully requests the Commission to consider these Comments in acting on the subject Notice of Proposed Rule Making.

Respectfully submitted,
PacifiCorp

By:

A handwritten signature in black ink, appearing to read "Harry A. Haycock", written over a horizontal line.

Harry A. Haycock
Senior Vice President